

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BRIAN FLORES, STEVE WILKS and RAY  
HORTON, as Class Representatives, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

THE NATIONAL FOOTBALL LEAGUE;  
NEW YORK FOOTBALL GIANTS, INC.  
d/b/a NEW YORK GIANTS; MIAMI  
DOLPHINS, LTD. d/b/a MIAMI  
DOLPHINS; DENVER BRONCOS  
FOOTBALL CLUB d/b/a DENVER  
BRONCOS; HOUSTON NFL HOLDINGS,  
L.P. d/b/a HOUSTON TEXANS; ARIZONA  
CARDINALS FOOTBALL CLUB LLC d/b/a  
ARIZONA CARDINALS; TENNESSEE  
TITANS ENTERTAINMENT, INC. d/b/a  
TENNESSEE TITANS and JOHN DOE  
TEAMS 1 through 26,

Defendants.

Civil Action No.: 22-CV-00871 (VEC)

DECLARATION OF MICHAEL W. CASPINO

I, Michael W. Caspino, do hereby declare as follows:

1. The Notice of Appearance that I filed indicated that I would be filing a Pro Hac Vice Application and would thus not be appearing as a member of the Southern District of New York.
2. I have provided a copy of a Certificate of Good Standing for the California Bar.
3. Any representation that I was “admitted or otherwise authorized to practice in this Court” was based upon the belief that I would be filing a Motion for Pro Hac Vice that would be granted by the Court.
4. It was decided that I would not be representing Mr. Wilks in this action mid-May 2025.

5. I specifically used the term “pro hac vice pending” during the time period between the appearance and the filing of the Motion for Pro Hac Vice. Once the Motion for Pro Hac Vice is filed, we then use the term “Pro Hac Vice Filed.”

6. I am unable to find the exact date when my license lapsed in the State of Nevada. To my knowledge, it was in 2018.

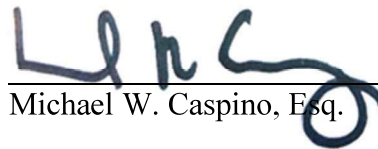
7. I am unable to find the exact date that my license lapsed in Colorado. To the best of my knowledge, it was in 2018.

8. I was reinstated to the Arizona Bar on April 29, 2025.

9. A copy of said reinstatement letter is attached hereto.

10. I should not be referred to the disciplinary panel of this Court because whatever misrepresentation I made was in error and I did not perform any legal work before this Court.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 31<sup>st</sup> day of July, 2025, in Rancho Santa Margarita, California.

  
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Michael W. Caspino, Esq.